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September 19, 2006

BY ELECTRONIC FILING

Honorable Gregory M. Sleet, U.S.D.J.  
United States District Court  
J. Caleb Boggs Federal Building  
844 N. King Street - Room 4324  
Wilmington, Delaware 19801

Re: Integrated Health Services v. THCI Company, LLC  
Civil Action No. 04-910 (GMS)

Dear Judge Sleet:

In anticipation of the discovery teleconference scheduled for September 21, 2006 at 10:00 a.m. in the above-captioned matter, the parties jointly submit the following items to be presented to the Court:

Defendant's Issues:

- Plaintiffs' refusal to disclose documents and instruction prohibiting testimony relating to the sale of Abe Briarwood Corporation;
- Plaintiffs' counsel's refusal to provide dates on which THCI may depose Murray Forman;

Plaintiffs' Issues:

- Defendant's failure, despite promises of production by several dates long past, to produce the documents it had agreed to produce in response to plaintiffs' Request for Production.

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- Extension of the discovery cutoff date to allow for completion of items noticed before the cutoff date, and a concomitant extension of the time to make substantive motions.

Thank you for Your Honor's consideration.

Respectfully,

A handwritten signature in black ink, appearing to read "Collins J. Seitz, Jr.", written in a cursive style.

Collins J. Seitz, Jr.  
(Bar No. 2237)

CJS,Jr./saj

cc: Clerk of the Court  
Michael R. Lastowski, Esquire (by electronic service)  
Aurora Cassirer, Esquire (by electronic service)  
David S. Sager, Esquire (by electronic service)